

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

D-1 TIMOTHY EDMUNDS,

Defendant.

Case No. 21-cr-20721
Hon. Sean F. Cox

Defendant's Motion to Modify Bond Conditions

Defendant Timothy Edmunds moves this Court for an order modifying bond conditions to remove location monitoring or allow him to be placed on standalone monitoring. Edmunds does not request any conditions change concerning U.S. Pretrial Services custody of travel documents—the U.S. Passports issued to Edmunds are in the possession of U.S. Pretrial Services. Pursuant to Local Rule 7.1, the government has indicated it opposes this motion.

In support of this motion, Edmunds states as follows.

1. In December 2022, Edmunds was charged in an indictment with embezzlement, fraud, and one count of money laundering.
2. Discovery in this matter is voluminous and the alleged offenses are complex, as a result, this case will proceed slowly.

3. After over 2 months on a tether with strict restrictions (and many future months to come based on the current pace of proceedings), Edmunds seeks bond conditions allowing for removal of the electronic monitoring or standalone monitoring through pretrial services.

4. Since bond conditions were imposed, Edmunds obtained several new employment opportunities that cannot be completed with his current home confinement restrictions. He maintains and supports a primary residence in Madison Heights with his wife. Edmunds' wife is a U.S. citizen and she does not possess a passport. Edmunds' ties to the E.D. Mich. are strong.

5. The original concerns for placing Mr. Edmunds on electronic monitoring with strict restrictions have been proven false or no longer exist.

6. U.S. Pretrial Services has stated to undersigned counsel that Edmunds has been compliant with the conditions of pretrial release to date. U.S. Pretrial Services also stated they do not view Edmunds as a supervision risk and do not oppose a modification to his bond conditions that allow for standalone monitoring. Additionally, pretrial initially recommend a \$10,000 unsecured bond with no electronic monitoring.

Conclusion

Edmonds moves for an order modifying bond conditions to remove location monitoring or allow for standalone monitoring contingent upon U.S. Pretrial Services maintaining custody of his U.S. Passports.

Respectfully submitted,

/s/ Joseph Arnone

Joseph Arnone

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Dated: February 16, 2022

CERTIFICATE OF SERVICE

I hereby certify I electronically filed the foregoing document with the Clerk of the Court using the ECF system on February 16, 2022. As a result, notification of this filing will be sent to all counsel of record.

Respectfully submitted,

/s/ Joseph Arnone
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